



June 2007

## Information Request Questions: Owners/Operators – Chemical and Manufacturing Plants

### GENERAL

1. Specify the dates, quantities of materials, concentration of product strength (i.e., reagent grade trichloroethane and 1% benzene) method of transportation on any such materials received containing the hazardous substances identified above.
2. Specify the purpose for which Company X received or was provided materials containing the hazardous substances listed or reshipment as trichloroethane, waste solvent or oil containing hazardous substances for recycle or salvage, or product grade benzene for onsite chemical manufacturing or custom blending).
3. Describe onsite handling and storage of materials containing the above-listed hazardous substances. Describe any procedures for leak detection for storage tanks or vessels containing materials which contain the above-listed hazardous substances.
4. Provide all analytical data on the presence, absence or concentrations of the above-listed hazardous substances in materials received at the Facility.
5. With respect to the Facility's septic tank and leachate disposal system (tile field) to which the toilet drains, the following additional information is required to determine the potential for hazardous substances to be released into the environment.
6. Provide specifications and details on the design and installation of the septic (i.e., size and depth of the tank, construction of the tank, depth and type of field tile).
7. Describe any maintenance and repair for the septic system, specifically but not limited to the use of any organic chemicals list for any septic cleaning materials used in the septic.
8. What is the actual composition of the catalyst received by Company A?
9. What end products are produced using the catalyst reclaimed by Company A?
10. What are the chemical constituents, as determined by analysis, of the catalyst as it is removed from the production unit before cleaning, after cleaning, and after thermal treatment?
11. Are \_\_\_\_\_, \_\_\_\_\_ or similar compounds used in reactions related to the manufacture of the above end products?
12. What are the temperature and pressure ranges for the reactions and manufacturing processes for the above end products?
13. Are there any halogens or anhydrous halogen acids piped into the reactant system?
14. Can halogens or anhydrous halogen acids be introduced into the manufacturing system while \_\_\_\_\_ is present?
15. What solvents are used to clean the catalyst prior to heat treatment?
16. What compounds are removed from the spent catalysts by cleaning?
17. Are any polyhalides (e.g., phosphorous trichloride) used at the manufacturing Facility?
18. Are any grignard reagents used in the manufacturing process?
19. Can hydrogen donors be introduced into the manufacturing process?
20. Identify the powder that was used to neutralize the flux wash water. Provide the chemical name and nature of this powder. Indicate the volume used and the time period during which this powder was handled.
21. With regard to the disposal lagoons located onsite, provide information on:
  - a. the volume capacity,
  - b. the construction materials,
  - c. the method of construction,
  - d. the frequency of cleaning and
  - e. the method of cleaning.

22. Identify all current and/or past production records kept by the Company and describe the contents of such records.

### **PRODUCTION PROCESSES**

23. Identify all equipment which was used at the Site in your operations. If such equipment was removed from the facility identify the reason for such removal and the present location of such equipment. If any of the equipment was sold, identify the name and address of the purchaser, the sale price and whether the sale price has been paid.
24. Identify all substances including, but not limited to Hazardous Substance Sigma which were ground, formulated and/or processed by Company X for Company Y. For each of these substances please answer the following questions:
- Describe in detail all aspects of the grinding, formulating and/or processing of Company X's chemicals by each of the Y companies.
  - Describe any loss allowances granted to the Y Companies during grinding, formulating and/or processing of Company X's chemicals. If this information is unavailable please estimate the percentage loss of technical grade material typically incurred in the grinding, formulating and/or processing of Company X's products by Y Companies. Explain how you determined this estimated amount.
  - Describe any monitoring or oversight which Company C provided during the actual grinding, formulating and/ or processing which occurred at the Y Companies.
  - Describe any testing which company x performed on the work in progress or on the finished product. Provide copies of all laboratory and test results.

### **PRODUCT DISTRIBUTION**

25. Please identify all substances including, but not limited to, Hazardous Substance Sigma which were ground, formulated and/or processed by Company X for Company Y. For each of these substances please answer the following questions:
- Describe in detail what happened to the finished product once it had been packaged by Company X.
  - Once the finished product was packaged was it shipped from Company X to Company Y or was it delivered to Company Y's customers? Provide copies of any documents which pertain to shipping and/or transport of the Company Y product from Company X.
  - Describe any measures taken by Company Y to guarantee the quality of the final Company Y product as ground, formulated and/or processed by the X Companies.